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July 11, 2022

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Trevor Milton*, S1 21 Cr. 478 (ER)

Dear Judge Ramos:

On behalf of Trevor Milton, I write respectfully to request permission to file under seal Exhibit 2 to the Declaration of Bradley J. Bondi Accompanying Defendant's Motion to Dismiss Count Four of the Superseding Indictment with Respect to So-Called "Lulling" Conduct or, in the Alternative, for a Bill of Particulars ("Bondi Declaration").

Exhibit 2 to the Bondi Declaration is a collection of material produced by the government pursuant to 18 U.S.C. § 3500 that all has been designated "Highly Confidential" in accordance with the August 18, 2021 Protective Order (ECF 14) (the "Protective Order"). The Protective Order requires that neither party "attach any materials designated Highly Confidential pursuant to [the Protective] Order to any public filings with the Court." Protective Order ¶ 7. Accordingly, we respectfully request permission to file Exhibit 2 under seal.

Pursuant Rule 3(ii) of Your Honor's Individual Practices, we will file the unredacted documents under seal on ECF and deliver unredacted copies to Chambers.

CAHILL GORDON & REINDEL LLP

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Respectfully submitted,

/s/ Bradley J. Bondi

Bradley J. Bondi

cc: Counsel of Record (via ECF)